



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

00001

EPA Region 5 Records Ctr.



247938

REPLY TO THE ATTENTION OF:

DATE: **JAN 15 1998**

SUBJECT: **ACTION MEMORANDUM:** Request for a Exemption to the 12-Month Statutory Limit for the Time-Critical Removal Action at the Cuneo Press Site, Chicago, Cook County, Illinois (Site ID # BO)

FROM: Fredrick A. Micke, On-Scene Coordinator
Emergency Response Section II

Verneta Simon, On Scene Coordinator
Emergency Response Section III

TO: William E. Muno, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval for a 12-month exemption to continue and complete the Time-Critical Removal Action at the Cuneo Press site located in Chicago, Cook County, Illinois. The continued action is necessary to mitigate the immediate threat to public health and the environment posed by the presence of radium-226 contaminated soil at the Cuneo Press site (CPS). Radium-226 is a hazardous substance as defined in the Comprehensive Environmental Response, Compensation and Liability Act, Section 101(14). Radium is also listed as a Hazardous Substance in 40 CFR 302.4

There are no nationally significant or precedent-setting issues associated with the Cuneo Press site.

The Cuneo Press site is not on the National Priorities List (NPL)

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# ILD990786261

The CPS is located at 2201 Grove Street in Chicago, IL in a partially developed industrial area of approximately 4.5 acres. The site is situated along the eastern bank of the South Branch of the Chicago River, approximately four miles to the southwest of the Chicago Loop. [The latitude is 41.8498° north. The longitude is 87.6425° west.]

Please refer to the attached September 28, 1994 and October 31, 1996 Action Memoranda for a further description of site conditions and historical background information.

On August 26, 1996, the City of Chicago informed USEPA of the possible presence of radium-contaminated soil in an area 30' x 100' based on sample results and gamma readings from their consultant, Roy F. Weston. USEPA reviewed the data and conducted a limited radiation survey with hand-held detectors on September 19, 1996. Results of this limited survey were as follows: background radiation was 2,500 to 4,000 counts per minute, and the highest reading in the suspected contaminated area was 214,000 counts per minute. In addition, our survey demonstrated that the contaminated area was larger than previously identified by the City of Chicago, approximately 200' x 30'. Furthermore, the data presented the City to support their claim of radium contamination was determined by us to be inadequate because the laboratory had used the wrong scientific library. In conclusion, the City needs both our technical and financial assistance to promptly mitigate the radium contamination at CPS.

The 12-month extension is necessary to initiate and complete the following removal activities: the City of Chicago's performance of the excavation and transportation of radium contaminated soil and the disposal of the contaminated soil. The removal funding will be used to pay the disposal costs, which will be reimbursed by the City of Chicago. The removal activities have been delayed because of difficulties in finalizing an agreement between USEPA and the City of Chicago. It is anticipated that an agreement in the form of a CERCLA cooperative agreement will be completed in the near future. Under this agreement, the City will be obligated to reimburse USEPA for the disposal costs.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITY

Please refer to Section III of the attached October 31, 1996 Action Memorandum.

IV. ENDANGERMENT DETERMINATION

Given the present site conditions, the nature of hazardous substances on-site, and the potential exposure pathways described in sections II and III of the October 31 Action Memorandum (attached), actual or threatened releases of hazardous substances from the site, if not addressed by implementing the continued response action selected in this 12-Month Exemption Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, and the environment.

V. REQUEST FOR AN EXEMPTION FROM THE 12-MONTH STATUTORY LIMIT

Section 104(c) of CERCLA, as amended, allows exemptions from the 12-month limitation in that section under the following conditions: (1) where continued response actions are immediately required to prevent, limit, or mitigate an emergency; (2) where there is an immediate risk to public health or welfare or the environment; and (3) where such assistance will not otherwise be provided on a timely basis. CERCLA Delegation 14-3 (9/13/87) delegates to the Regional Administrator approval authority for this exemption. The Regional Administrator delegated this authority to the Director of the Superfund Division. As indicated below and in the attached Action Memoranda, all of these conditions are satisfied.

Continued response actions are immediately required to prevent, limit or mitigate emergency

As indicated above and in the attached Action Memoranda, this is a time-critical removal action. Radium contamination is present in soil at the CPS, with radium concentrations as high as 55 pico-Curies per gram (pCi/g) and radiation readings as high as 214,000 counts per minute. The CPS is situated within a highly populated area of downtown Chicago. Exposure of nearby populations to hazardous substances exists at the CPS because the radium-contaminated area is uncovered and is located in a truck turn-around utilized by neighboring industry. Therefore, tracking of radioactivity is possible on tires and shoes. Furthermore, precipitation may exacerbate this situation by producing mud which will further adhere to tires and shoes, and it may cause radioactivity to further leach into the soil and surrounding areas. Also, airborne contamination is possible because contaminated soil in the truck turn-around can easily be dispersed by wind and truck activity.

There is an immediate risk to public health or welfare or the environment

As indicated above, radium contamination is present in soil at the CPS, with radium concentrations as high as 55 pCi/g and radiation readings as high as 214,000 counts per minute. The CPS is situated within a highly populated area of downtown Chicago. Exposure of nearby populations to hazardous substances exists at the CPS because the radium-contaminated area is uncovered and is located in a truck turn-around utilized by neighboring industry. Therefore, tracking of radioactivity is possible on tires and shoes. Furthermore, precipitation may exacerbate this situation by producing mud which will further adhere to tires and shoes, and it may cause radioactivity to further leach into the soil and surrounding areas. Also, airborne contamination is possible because contaminated soil in the truck turn-around can easily be dispersed by wind and truck activity.

Assistance will not otherwise be provided on a timely basis

The City of Chicago will be undertaking excavation and transport of the soil, but has requested USEPA's assistance in disposing of the contaminated soil. No other assistance is currently

available.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

Please refer to Section V of the October 31, 1996 Action Memorandum for detailed projected cost information. The remaining CPS removal action activities discussed above will be completed within the projected cost budget described in the referenced section.

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If continued removal actions are delayed or denied, concerns over public health and the environment will continue and, if actions are delayed too long, USEPA may be required to expend additional resources for the removal and disposal of additional contaminated soil if more soil becomes contaminated. A release of hazardous substances could affect the persons living and working in the surrounding community. The 1990 population within one mile of the site was 38,548.

VIII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

IX. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an enforcement confidential addendum.

IX. RECOMMENDATION

This decision document describes the selected removal action for CPS in Chicago, Cook County, IL developed in accordance with CERCLA as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The selected removal action is not inconsistent with the NCP. This decision is based on the Administrative Record for this site.

Conditions at the site meet the criteria as set forth in the NCP Section 300.415 (b) (2) for a removal. I recommend your approval of an exemption from the 12-month limit to allow continued removal actions at the CPS. With your approval, the total project ceiling remains at \$318,000. Of this, an estimated \$165,000 will be used for disposal costs. You may indicate your decision by signing below.

APPROVED: _____

Director, Superfund Division

DATE: _____

1/15/98

DISAPPROVE: _____

Director, Superfund Division

DATE: _____

- Attachments:
1. Action Memorandum dated October 31, 1996
 2. Action Memorandum dated September 28, 1994
 3. Index to the Administrative Record

cc: K. Mould, U.S. EPA HQ, 5202G

Don Henne, U.S. Department of the Interior

Custom House, Room 217

200 Chestnut Street

Philadelphia, PA 19106-2904

PAGE 6
BCC: PAGE

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 1

ACTION MEMORANDUM DATED

October 31, 1996



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

DATE: OCT 31 1996

SUBJECT: ACTION MEMORANDUM: Request for a Time-Critical Removal Action at the Cuneo Press Site, Chicago, Cook County, Illinois (Site ID # BO)

FROM: Fred Bartman, On-Scene Coordinator *Donald Bruce*
Emergency Response Section II

Verneta Simon, On Scene Coordinator *Verneta Simon*
Emergency Response Section III

TO: William E. Muno, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request approval to expend an additional \$165,670 for a total of \$318,000. This funding will be used to abate an imminent and substantial threat to public health and the environment posed by the presence of radium-226 contaminated soil at the Cuneo Press site (CPS) in Chicago, Cook County, Illinois. Radium-226 is hazardous substance as defined in the Comprehensive Environmental Response Compensation and Liability Act, Section 101(14). Radium is also listed as a Hazardous Substance in 40 CFR 304.2. The proposed removal funding will be used to pay the tipping fee at the disposal facility. This project will require an estimated five off-site working days to complete.

This site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILD990786261

A. Physical Location and Site Characteristics

The original Action Memo (Attachment 1) dated September 28, 1994, contains a description of site conditions and background information prior to mobilization of the Emergency Response Contractor Services (ERCS) personnel. In September 1994, USEPA mobilized ERCS personnel to consolidate and characterize 300 drums and containers scattered throughout buildings.

In November 1994, the City of Chicago demolished the main site building as part of its effort to redevelop the site property. In addition, USEPA issued a Unilateral Administrative Order (UAO) to

the responsible party, 1412 Washington Corporation, to dispose of 300 drums and complete full closure of four underground storage tanks. The responsible party partially complied with the UAO by removing three underground storage tanks and disposing of a majority of the drums. USEPA had to pay for disposal of one drum and the contents of three underground storage tanks. Also, the responsible party did not conduct any soil remediation during their underground storage tank removals, which will now be conducted by the City of Chicago.

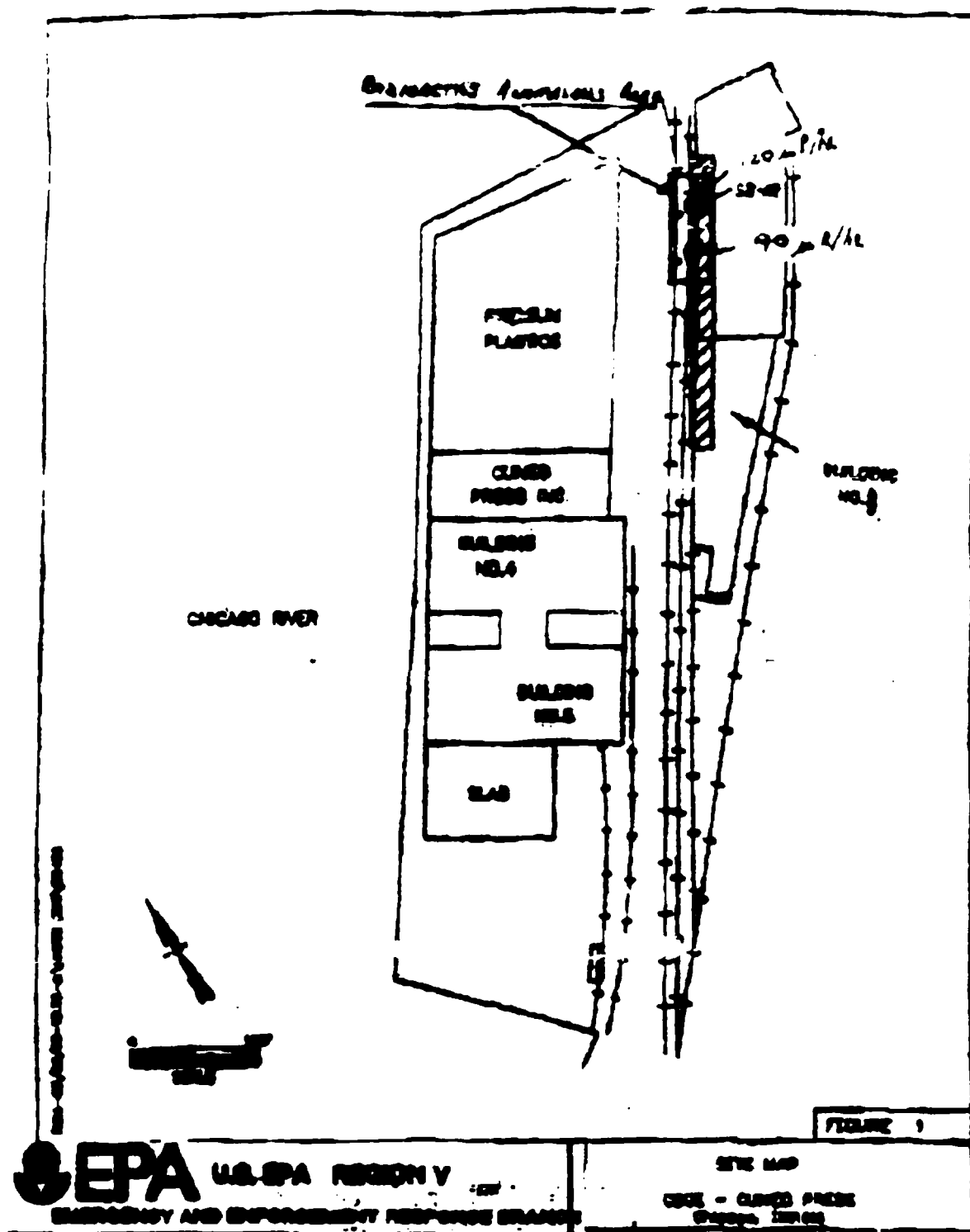
On August 26, 1996, the City of Chicago informed USEPA of the possible presence of radium-contaminated soil in an area 30' x 100' based on sample results and gamma readings from their consultant, Roy F. Weston (Figure 1). USEPA reviewed the data and conducted a limited radiation survey with hand-held detectors on September 19, 1996. Results of this limited survey were as follows: background radiation was 2,500 to 4,000 counts per minute, and the highest reading in the suspected contaminated area was 214,000 counts per minute. In addition, our survey demonstrated that the contaminated area was larger than previously identified by the City of Chicago, approximately 200' x 30' (Figure 1). Furthermore, the data presented by the City to support their claim of radium contamination was determined by us to be inadequate because the laboratory had used the wrong scientific library. In conclusion, the City needs both our technical and financial assistance to promptly mitigate the radium contamination at CPS.

B. REMOVAL ACTIONS TO DATE

The initial Action Memorandum for this Site was signed on September 28, 1994. ERCS personnel was mobilized to the Site on September 12, 1994. The following removal activities were performed:

- Consolidation and characterization of 300 drums and containers scattered throughout buildings;
- Unilateral Administrative Order (UAO) issued to the responsible party, 1412 Washington Corporation, for disposal of 300 drums and full closure of four underground tanks;
- Disposal of one drum and contents of three underground storage tanks; and
- City of Chicago agreed to conduct all remaining remediation work associated with the one remaining underground storage tank and soils associated with all the underground tanks.

Background radiation is radiation from an uncontaminated area.



- Crosshatched area is above background (2,500 -4000 counts per minute) per U.S. EPA survey 9-19-96 survey

- Gamma readings obtained by Roy F. Weston in microRoentgens per hour ($\mu R/hr$) for radium.

- All buildings except for Premium Plastics has been demolished by the City of Chicago.

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The funds requested herein are to cover disposal costs of the radium-contaminated soil discovered by the City of Chicago.

C. STATE AND LOCAL AUTHORITIES' ROLE

The On-Scene Coordinator (OSC) will continue to coordinate the removal action with the City of Chicago's Department of Environment. The City of Chicago has indicated it will enter into an Administrative Order by Consent and reimburse USEPA for costs associated with disposal.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the Site present an imminent and substantial endangerment to human health and the environment, based upon factors set forth in paragraph (D), (2) of Part 300.415 of the National Contingency Plan (NCP). These following conditions exist at the Site:

- a) **Actual or potential exposure of nearby human populations, animals, or food chain from hazardous substances or pollutants or contaminants;**

Exposure of nearby populations to hazardous substances exists at the Site because the radium-contaminated area is uncovered and is located in a truck turn-around utilized by neighboring industry. Therefore, tracking of radioactivity is possible on tires and shoes. Also, airborne contamination is possible because contaminated soil in the truck turn-around can easily be dispersed by wind and truck activity

- b) **High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate:**

This condition exists because data from the City of Chicago indicates radium concentrations as high as 55 picoCuries per gram (pCi/g) at CPS. Nationally, uncontaminated areas have radium concentrations about 1 pCi/g. Gamma levels at CPS were found to be 65 times the average background value.

- c) **Weather conditions that may cause hazardous substances, or pollutants or contaminants to migrate or to be released:**

There are two possible routes of migration: wind and precipitation. Winds could cause the radioactivity to become airborne. Precipitation can cause the radioactivity to migrate either by becoming mud and adhering to tires and shoes or percolating through the soil.

- d) **The unavailability of other appropriate federal or state response mechanisms to respond to the release:**

This factor supports the actions proposed herein because USEPA met with representatives of the City of Chicago on October 9, 1996, to discuss the amount of assistance they were expecting. The outcome of our discussion was that the City of Chicago would fund the labor and equipment needed to excavate the soil and USEPA would take title to the waste, dispose of it and provide on-site assistance, as necessary.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of radium, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. PROPOSED ACTIONS

1. Proposed action description

The following actions must be completed to alleviate the potential and actual threats to human health and the environment posed by the hazardous contaminants at the Site:

- Complete a waste profile of the contaminated soil; and
- Prepare an Interagency Agreement with the U.S. Army Corps of Engineers to dispose of approximately 670 cubic yards of radium-contaminated soil and debris.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Completion of removal activities will take approximately five (5) 8-hour work days. This time frame may be extended based on actual disposal schedules since USEPA will have to complete a waste profile, an Interagency Agreement, and an Administrative Order by Consent. The OSC has been planning for post-removal site control, consistent with the provisions of Section 300.415

(k) of the NCP. All contamination will have been removed at the Site and the Site should need no further controls.

2. Applicable or relevant and appropriate requirements

All applicable, relevant, and appropriate requirements (ARARs) of Federal law will be complied with to the extent practicable. A request for ARARs will be sent to both the Illinois Environmental Protection Agency and the Illinois Department of Nuclear Safety. Any State ARARs identified in a timely manner for this removal will be complied with to the extent practicable. In accordance with the revised NCP, Section 300.825 (a)(1), the response from the State will be added to the administrative record for this site once the response has been received and evaluated.

B. ESTIMATED COSTS

Estimated project costs presented below.

<u>EXTRAMURAL COSTS:</u>	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
Clean-up Contractor Costs	\$ 93,418.24	\$ - 0 -	\$ 93,418.24
20% Contingency	\$ 18,683.65	\$ - 0 -	\$ 18,683.65
Subtotal	\$112,101.89	\$ - 0 -	\$112,101.89
Total TAT, including multiplier costs	<u>\$ 13,153.20</u>	<u>\$ - 0 -</u>	<u>\$ 13,153.20</u>
Extramural Subtotal	\$125,255.09	\$ - 0 -	\$125,255.09
Extramural Contingency (15%)	\$ 18,788.26	\$ - 0 -	\$ 18,788.26
TOTAL, EXTRAMURAL COSTS:	\$144,043.35	\$ - 0 -	\$144,043.35
IAG w/USACE	\$ - 0 -	\$162,350	\$162,350
<u>INTRAMURAL COSTS:</u>			
U.S. EPA Direct Costs	\$ 3,198.00	\$ 1,320	\$ 4,518
U.S. EPA Indirect Costs	<u>\$ 5,088.00</u>	<u>\$ 2,000</u>	<u>\$ 7,088</u>
TOTAL, INTRAMURAL COSTS:	\$ 8,286.00	\$ 3,320	\$ 11,606
TOTAL REMOVAL PROJECT CEILING	\$152,329.35	\$165,670	\$318,000

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances,

pollutants or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

Increased risk to public health and the environment will result if no or delayed action ensues. Continued exposure to the elements may result in adverse affects to the environment, which may result in migration of the contaminants off-site via air or water.

VII. OUTSTANDING POLICY ISSUES

This site is part of the City of Chicago's brownfields redevelopment program. The previous removal action conducted by USEPA allowed demolition of the site buildings to proceed. This removal action resolves a significant soil contamination problem. Both USEPA removal actions will assist the City with their redevelopment efforts.

VIII. ENFORCEMENT

For administrative purposes, the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Cuneo Press Site, in Chicago, Cook County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site (see Attachment 2).

Because the conditions at the Site continue to meet the NCP, Section 300.415(b)(2) criteria for a removal action, I recommend your approval of this \$165,670 ceiling increase. Of this, an estimated \$162,350 will be used for an Interagency Agreement. Please indicate your decision by signing below.

APPROVE: _____

Paul M. J. F. WEM
SUPERFUND DIRECTOR

DATE: 10/31/96

DISAPPROVE: _____

SUPERFUND DIRECTOR

DATE: _____

Enforcement Confidential Addendum

Attachments

1. September 28, 1994, Action Memorandum
2. Administrative Record Index

cc: E. Watkins, U.S. EPA, OERR, 5202-G
D. Henne, U.S. Department of the Interior
Office of Environmental Policy and Compliance
U.S. Custom House, Room 217
200 Chestnut Street
Philadelphia, PA 19106
G. King, IEPA Superfund Coordinator

**CUNEO PRESS SITE
ENFORCEMENT ADDENDUM
OCTOBER 1996
1 PAGE**

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 2
ACTION MEMORANDUM DATED
September 28, 1994



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

MEMORANDUM

SEP 28 1994

HSE-5J

DATE:

SUBJECT: ACTION MEMORANDUM: Request for an Emergency Removal Action and a Time Critical Removal Action at the Cuneo Press Site, Chicago, Cook County, Illinois
(Site ID # BO)

FROM: Fred Bartman, On Scene Coordinator *Donald Prince*
for Emergency Response Section II

THRU: Richard Karl, Chief *Donald Prince*
for Emergency & Enforcement Response Branch

TO: Jodi L. Traub, Associate Division Director
Office of Superfund

I. PURPOSE

The purpose of this Action Memorandum is to document receipt of a verbal authorization to expend up to \$30,000 and to request approval to expend an additional \$127,330 for a total of \$157,330. This funding will be used to abate an imminent and substantial threat to public health and the environment posed by the presence of ignitable (hazardous waste code D001) and solvent waste (hazardous waste codes F001 and F005) found in abandoned drums and tanks at the Cuneo Press site (CPS) in Chicago, Cook County, Illinois.

The response action proposed herein will mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous wastes located at the site. Proposed removal actions include: characterization of the chemical hazards on the site; securing the site to prevent public access; consolidation, bulking and/or stabilization of the hazardous

materials; and removal and disposal of hazardous material and special waste off site. A verbal authorization to expend up to \$ 30,000 to initiate an Emergency Action was obtained from Richard Karl, Chief of Emergency and Enforcement Response Branch on September 8, 1994. This action included staging drums into a more secure area and characterizing waste for future disposal.

Access to hazardous materials and the continuing threat of release require that this removal be classified as time critical. This project will require an estimated eight on-site working days to complete.

This site is not on the National Priorities List.

1.1. SITE CONDITIONS AND BACKGROUND

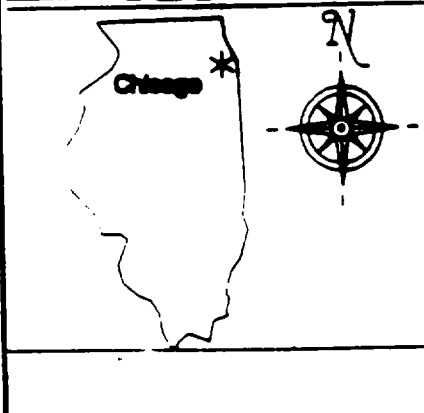
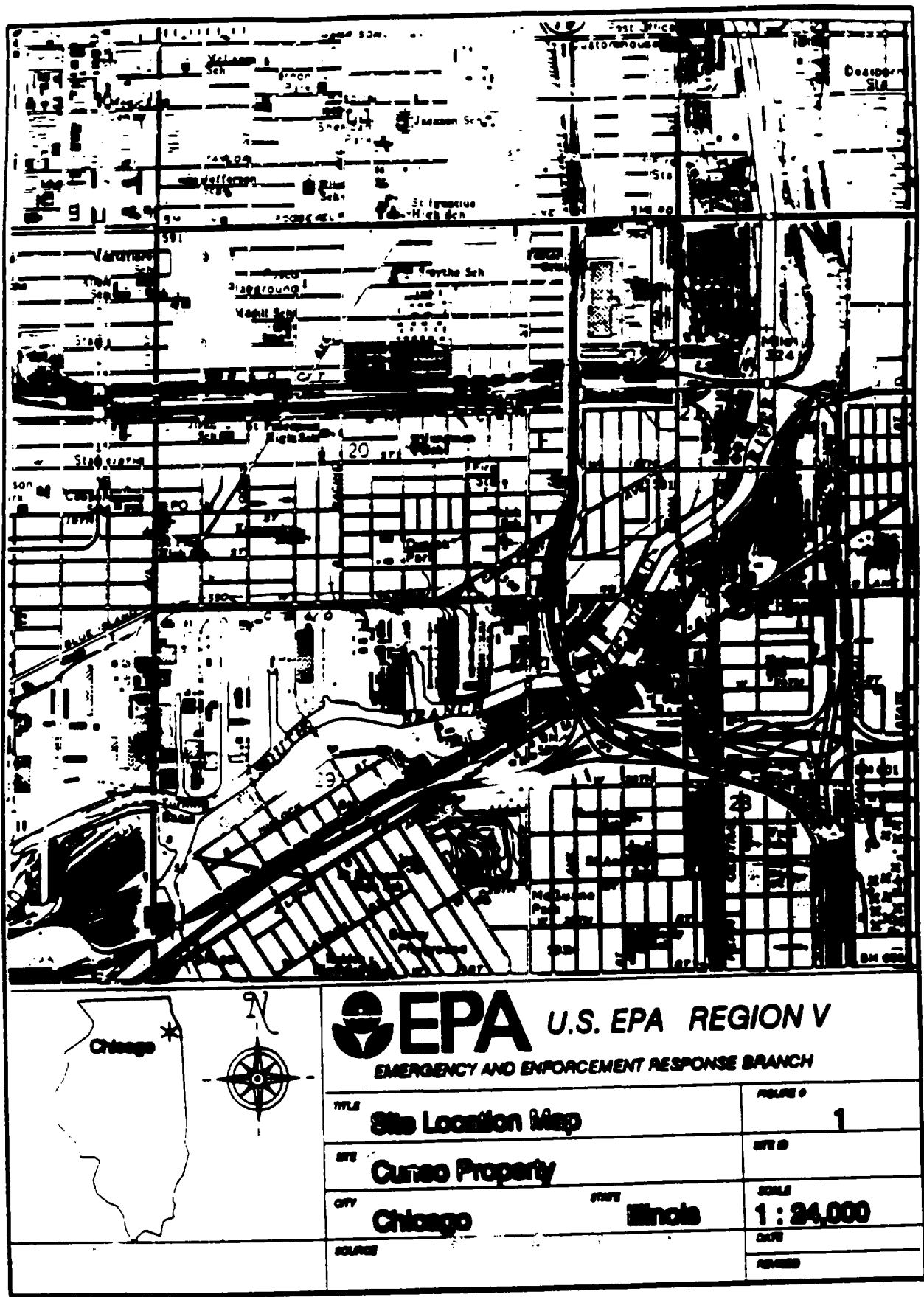
CERCLIS ID #ILD990786261


In August 1994, the City of Chicago verbally requested that the United States Environmental Protection Agency (USEPA) conduct a removal site assessment at the CPS. The City of Chicago also intends to demolish the buildings on the property in November 1994.

The site is located at 2201 Grove street in Chicago, Illinois in a partially developed industrial area of approximately 4.5 acres (Figure 1). The site is situated along the eastern bank of the South Branch of the Chicago River, approximately four miles to the southwest of the Chicago Loop. The buildings (Figure 2) were constructed in 1925 to 1927 by the Cuneo Press Company, a large scale printing facility that occupied the subject property for approximately 50 years. It is believed that the printing operations ceased and the buildings were sold in 1977.

According to Environmental Site Assessment Reports prepared on behalf of the City, dated April 24, 1994, the site buildings contain approximately 125 55-gallon abandoned drums, ten storage tanks that vary in size from 250 to 1000 gallons, and four large transformers. Six underground storage tanks (UST) are also present on site including a 50,000 gallon vault used to store fuel oil.

The USEPA visited the site on August 23 and 29, 1994 and observed the following conditions. The two on-site buildings are very large (approximately 700,000 square feet), seven story dilapidated commercial buildings that have suffered extensive fire and water damage due to a tire fire and a movie production. The interiors of both buildings have been vandalized for the salvage value of scrap metal (i.e. plumbing and electrical components).



 U.S. EPA REGION V EMERGENCY AND ENFORCEMENT RESPONSE BRANCH	
TITLE Site Location Map	
SITE Cunco Property	
CITY Chicago	STATE Illinois
SCALE 1 : 24,000	
DATE	
REVISED	

Cermak (22nd St.)

Plastic Manufacture

Abandoned Building
(Cuneo Property)

South Branch
Chicago River

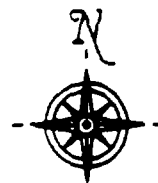
Abandoned Building
(Cuneo Property)

Building 2

(Tire Fire Area)

South Grove Ave

Building 1



Building 1

Approx. 10 drums in the flooded
Basement.
Several drums on the 4th fl.
(Corrosive Drum).

Building 2

50 flammable drums on the 4th fl.
30 to 40 drums were scattered
throughout the west end of the
basement and 1st fl.
A tire fire occurred in bld 3.



EPA

U.S. EPA REGION V

EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

TITLE Sketch Map		FIGURE # 2
SITE Cuneo Property		DATE 9/6/94
CITY Chicago	STATE Illinois	SCALE Not to Scale
DRAWN BY		CHECKED BY

The drum and tank locations as described in previous reports were confirmed. Many of the containers are in poor condition and are leaking or have been tipped over. Drum labels indicate flammable waste, methanol, toluene, multi-polymer solution and chlorinated solvents. Five drums were sampled and analyzed for flashpoint, volatile organics and pH. Flashpoints as low as 72 Degrees Fahrenheit were measured confirming the presence of RCRA ignitable waste (hazardous waste code D001). Volatile Organic Compounds including toluene at 37% to 60% and trichloroethylene (TCE) at 26% were detected confirming the presence of RCRA hazardous wastes F001 and F005.

Approximately nineteen transients live inside the buildings. According to some of the residents, individuals have been known to become intoxicated by inhaling or drinking the drum contents. Flammable drum contents were also used by scrappers to salvage copper wire by burning electrical coatings off.

On September 9, 1994, verbal authorization was obtained to expend up to \$ 30,000 to conduct an emergency action. On September 12, 1994, an ERCS crew was mobilized to stage the drums into a more secure area and characterize the waste. Mixing tanks, transformers and the 50,000 gallon fuel oil vault were also inspected and found to be empty. The USTs were also sampled and contained primarily water with some product. These tanks were used to store naphthalene.

While staging the drums, workers witnessed an individual siphoning a drum known to contain TCE and transferring the liquid into a five gallon pail. Used siphon hoses and funnels were also found where the drums were previously staged.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the CPS present an imminent and substantial threat to human health, welfare and the environment and meet the criteria for a removal action as stated in the National Contingency Plan, Section 300.415 (b)(2), specifically:

- a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

The CPS site is a facility in disrepair with deteriorating drums and tanks documented to contain hazardous substances. Because access is unrestricted, potential for direct exposure to hazardous substances exists. Transients that live on-site claim that drum contents are used by individuals to become intoxicated. The site is trespassed on a regular basis by scrappers and vandals. There may be an actual exposure due to direct ingestion and inhalation of toluene and TCE and other undocumented hazardous substances.

Chronic exposure to high levels of toluene can cause long term damage to the central nervous system. Studies of individuals who abuse this chemical indicate permanent changes to the white matter of the brain which correlate with the degree of functional impairment in affected individuals. Inhalation and/or ingestion to high levels of toluene could also lead to death.

TCE is a potential human carcinogen. TCE can also affect the central nervous system and reports have indicated hepatic and renal effects in humans.

b) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;

USEPA has confirmed the presence of drums containing hazardous substances. All drums were in varying stages of deterioration while some were observed to have leaked a portion or all their contents. At least three USTS were also found on-site and contain varying amounts of naphthalene.

c) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The drums are in unheated and open buildings and are subject to extreme temperature fluctuations common to the Chicago area. Rain and adverse climate conditions contribute towards continuing deterioration of the drums which will lead to an additional release of hazardous substances.

d) Threat of fire and explosion;

Sample results indicated drum contents with flashpoints as low as 72 degrees Fahrenheit. A major tire fire has occurred near the location of the drums in the past. Scrappers also routinely burn coatings off copper wires for its metal salvage value. Tires are still being stockpiled at the site. Due to the sites unrestricted access, the potential for a fire/explosion exists. If such an event occurs, contaminants could become airborne and may affect the nearby population.

IV. ENDANGERMENT DETERMINATION

Given the presence of ignitable waste (hazardous waste code D001) and solvent waste (hazardous waste codes F001 and F005) in deteriorating drums located in unsecured buildings subject to trespass and vandalism, and the potential exposure pathways described in Sections II and III above, actual or threatened releases from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Removal activities will require approximately eight, 12-hour on-site working days to complete. The threats posed by identified drums of hazardous waste meet the criteria listed in Section 300.415 (b)(2) of the NCP and are consistent with any removal or remedial action which may be required. The OSC proposes to undertake or has initiated the following actions to mitigate threats posed by drums containing hazardous substances on-site:

- 1) Develop and implement a Health and Safety Plan to cover removal activities;
- 2) Develop and implement a sampling and analytical program designed to identify drum and tank contents and other contaminated material;
- 3) Secure the site, overpack/consolidate remaining leaking, deteriorated drums and tanks, and segregate incompatible waste;
- 4) Stage, sample and conduct compatibility testing of liquids, sludges, soils and any other hazardous wastes or substances;
- 5) Bulk waste for disposal and or on-site treatment;
- 6) Collect bulked samples for disposal facility approval and;
- 7) Dispose of overpacked and bulked hazardous waste and empty drums and containers.

Detailed Cleanup contractor costs are presented in Attachment 1. The removal project cost ceiling summary is presented below:

REMOVAL PROJECT CEILING ESTIMATE

<u>EXTRAMURAL COST:</u>	<u>Proposed Ceiling</u>
Regional Allowance Costs:	
Cleanup Contractor	\$ 93,418.24
Contingency (20%)	<u>18,683.65</u>
Subtotal	\$112,101.89
Other Extramural Cost Not Funded from the Regional Allowance:	
Total TAT, including multiplier costs	<u>13,153.20</u>
Extramural Subtotal	\$125,255.09
Extramural Contingency (15%)	<u>18,788.26</u>
TOTAL EXTRAMURAL COSTS:	\$144,043.35
<u>INTRAMURAL COSTS:</u>	
U.S. EPA Direct Costs	
(\$30/hr * [96 hrs Regional + 3.6 HQ hrs])	\$ 3,198.00
U.S. EPA Indirect Costs	
(\$53/hr * 96 hrs Regional)	<u>5,088.00</u>
TOTAL INTRAMURAL COSTS:	\$ 8,286.00
TOTAL PROJECT CEILING ESTIMATE:	\$152,329.35

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the CPS which may pose an imminent and substantial endangerment to public health and safety, and to the environment and are consistent with the long term remedial action anticipated at this site. The response actions described in this memorandum do not pose a burden on affected property owners disproportionate to the extent to which that property contributes to the conditions being addressed.

The On-Scene Coordinator has begun planning for provision of post removal site control, consistent with the provisions of the NCP set forth at 40 CFR Section 300.415 (k).

All applicable or relevant and appropriate requirements (ARARs) of Federal law will be complied with to the extent practicable. Any State ARARs identified in a timely manner for this removal will be complied with to the extent practicable. In accordance with the revised NCP, Section 300.825 (a)(1), the response from the State to the request for ARARs will be added to the administrative record for this site once the response has been received and evaluated.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or non-action may result in increased likelihood of direct contact threat or further contamination which would threaten human health or the environment. Continued exposure to the elements would allow further deterioration of existing containment, leading to a potential release of contents.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum (Attachment II).

IX. RECOMMENDATION

This decision document represents the selected removal action related to the Cuneo Press site in Chicago, Cook County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record (Attachment III) for the site. Conditions at the site continue to meet the NCP, Section 300.415 (b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. The estimated removal project costs are \$ 152,330 of which up to \$ 130,890 could be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE:

R/B
Associate Division Director
Office of Superfund

DATE:

9/28/94

DISAPPROVE:

Associate Division Director
Office of Superfund

DATE:

Attachments

1. Enforcement Confidential Addendum
2. Initial Cost Projection Scenario
3. Administrative Record

cc: E. Watkins, OS-210
Don Henne, U.S. DOI
Tom Crause, IEPA

PAGE 11
BCC: PAGE

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT I

**CUNEO PRESS SITE
ENFORCEMENT CONFIDENTIAL ADDENDUM**

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 1

Summary Report

Page: 1

Initial Cost Projection Scenario: CUNEO

Projection ID Number: EIL848FA

Date: 09/12/94

Cleanup Contractor: RES5 - Riedel Environmental

TAT Contractor: E & E

Cost Projection Summary

Contractor Personnel	24,086.68
Contractor Equipment	5,187.20
Unit Rate Materials	9,702.99
At Cost Materials	153.62
Subcontractors	0.00
Waste Transportation	23,408.00
Waste Disposal	30,879.75
Cleanup Contractor Subtotal	93,418.24
Federal and State Agencies	0.00
Extramural Subtotal	93,418.24
20 % Extramural Contingency	18,683.65
Extramural Subtotal	112,101.89
TAT Personnel	7,729.20
TAT Special Projects	0.00
TAT Analytical Services	5,424.00
Total TAT Costs	13,153.20
Other Cost Items	0.00
Extramural Subtotal	125,255.09
15 % Project Contingency	18,788.26
Total Extramural Cost	144,043.35
EPA Regional Personnel	2,910.00
EPA Non-Regional Personnel	0.00
EPA Headquarters Direct	0.00
(0 % of Regional Hours)	
EPA Indirect	5,088.00
EPA Total	7,998.00
Project Total	152,041.35

Summary Report (cont.)

Page 1

Initial Cost Projection Scenario: CUNEC

Projection ID Number: E1L848FA

Date: 09/12/94

Cleanup Contractor: RES5 - Riebel Environmental

YAT Contractor: E & E

Project Scope
=====

Number	Step/Milestone	Estimated Duration	Cost
000	GENERAL SITE COSTS	8 Days	152,041.35
			152,041.35

**INITIAL COST PROJECTION SCENARIO
DETAILED REPORT BY CATEGORY
4 PAGES**

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 3
ADMINISTRATIVE RECORD

ATTACHMENT 3

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTIONADMINISTRATIVE RECORD
FOR
CUNEO PRESS SITE
CHICAGO, ILLINOIS

September 27, 1994

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
09/02/94	Ecology & Environment, Inc.	U.S. EPA	Preliminary Analytical Report Via Telefax	10
09/09/94	Vanderkloot, Bruce, D., J., City of Chicago	U.S. EPA	Letter re: Request for U.S. EPA Assistance	1
09/28/94	Bartman, F., U.S. EPA Inc.	Traub, J., U.S. EPA	Action Memorandum	16
09/30/94	Ecology & Environment, Inc.	U.S. EPA	Site Assessment Report	54

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTIONADMINISTRATIVE RECORD
FOR
CUNEO PRESS SITE
CHICAGO, ILLINOIS

September 27, 1994

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
09/02/94	Ecology & Environment, Inc.	U.S. EPA	Preliminary Analytical Report Via Telefax	10
09/09/94	Vanderkloot, J., City of Chicago	Bruce, D., U.S. EPA	Letter re: Request for U.S. EPA Assistance	1
09/28/94	Bartman, F., U.S. EPA	Traub, J., U.S. EPA	Action Memorandum	16
09/30/94	Ecology & Environment, Inc.	U.S. EPA	Site Assessment Report	54

UPDATE #1
OCTOBER 24, 1996

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
07/09/96	Axe, K. and W. Buchanan, Roy F. Weston, Inc.	Trumbull, W., Chicago Dept. of Environment	Letter re: Results of Radio Active Anomaly Sampling at the Cuneo Press Property	2
08/29/96	Simon, V., U.S. EPA	Trumbull, W., Chicago Dept. of Environment	Letter re: U.S. EPA's Comments on the Work Plan to Address the Radioactive Contamination at the Cuneo Press Site	4

10/09/96 Marrero, J., Simon, V ,
and L. Jensen, U.S. EPA
U.S. EPA

Memorandum re: Site 2
Inspection at the
Cuneco Press Site

00/00/00 Bartman, F. Munoz, W.,
and V. Simon, U.S. EPA
U.S. EPA

Action Memorandum:
Request for a Time-
Critical Removal Action
at the Cuneco Press Site
(PENDING)

ATTACHMENT 4**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION****ADMINISTRATIVE RECORD
FOR
CUNEO PRESS SITE
CHICAGO, COOK COUNTY, ILLINOIS****UPDATE #2
NOVEMBER 17, 1997**

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	00/00/00	Micke, F. U.S. EPA/ OSC	Muno, W. U.S. EPA	Action Memorandum re: Request for an Exemption to the 12-Month Statutory Limit for the Time-Critical Removal Action at the Cuneo Press Site, Chicago, Illinois (PENDING)	